

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA; the States of CALIFORNIA, COLORADO, GEORGIA, HAWAII, MARYLAND, and WASHINGTON; the DISTRICT OF COLUMBIA; and the Commonwealth of VIRGINIA, *ex rel.* Syed Salman Rizvi,

CASE NO. 19-cv-5779-BHS

**UNITED STATES' NOTICE  
OF CONSENT TO DISMISSAL**

**Plaintiffs,**

V.

**KAISER FOUNDATION HEALTH PLANS,  
INC., *et al.*,**

### Defendants.

Relator Syed Salman Rizvi has filed a Notice of Voluntary Dismissal of this *qui tam* action.

19 The United States hereby notifies the Court that it consents to the dismissal of this action without  
20 prejudice to the rights of the United States, pursuant to the False Claims Act, 31 U.S.C. §  
21 3730(b)(1), and based on its determination that such a dismissal is commensurate with the public  
22 interest and that the matter does not warrant the continued expenditure of government resources  
23 based on currently available information.

The United States further consents that the Relator's Complaint, the Relator's Notice of Dismissal, this Notice, the Court's Order dismissing this action, and all other filings in this action be unsealed.

Dated this 21st day of August, 2024.

Respectfully submitted,

TESSA M. GORMAN  
United States Attorney

*s/ Kayla C. Stahman*  
KAYLA C. STAHPMAN, CA #228931  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4067  
Email: [kayla.stahman@usdoj.gov](mailto:kayla.stahman@usdoj.gov)

*Attorneys for the United States of America*